

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GEB SHIPPING CO., LTD.,
:
Plaintiff, :
:
-against- :
:
EMMSONS INTERNATIONAL, LTD., : **NOTICE OF MOTION**
:
Defendants. :
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PLEASE TAKE NOTICE that upon the attached Declaration of Eric Lindquist, sworn to on March 7, 2007, the documents attached thereto, the Memorandum of Law submitted herewith, and upon all the pleadings and proceedings had herein, defendant Emmsons Ltd. will move this court before the Honorable Judge Richard C. Casey, at the United States District Court for the Southern District of New York, 40 Centre Street, Room 1350, New York, New York, as soon as counsel can be heard on a date to be set by the Court, for an order pursuant to Rule 12(b)(2) and Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing the Complaint and to vacate the ex-parte order for process of maritime attachment and garnishment pursuant to Rules B(1) and E(4)(f) of the Supplemental Rules for Certain Admiralty and Maritime Claims.

Dated: March 7, 2007
New York, New York

FOX HORAN & CAMERINI LLP

s/ Eric Lindquist
Eric Lindquist/EL4305